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July 27, 2022


**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York, 10007

Application Granted. Defendant's motion(s), if any, shall be filed by **August 29, 2022**. The Government's response, if any, shall be filed by **September 29, 2022**. Defendant's reply, if any, shall be filed by **October 13, 2022**. The Clerk of the Court is directed to terminate the letter motion at docket number 19.

Dated: July 28, 2022  
New York, New York

Re: *United States v. Lira*, 22-CR-151 (LGS)



**LORNA G. SCHOFIELD**

**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield:

I am the attorney for the defendant in the above-referenced matter. I am writing to respectfully request that the Court extend the pretrial deadlines by one month, making the deadline for the filing of pretrial motions August 29, 2022, with responses due September 29, 2022, and replies due by October 13, 2022. I have consulted with the attorney for the United States, and the Government is in agreement with this modification to the dates previously set in the Memorandum Order (ECF Doc. No. 11).

I request this one-month extension because the Government's discovery was produced, by agreement with the defense, approximately one-month past the due date. This delay was due to the quantity of discovery and the time needed to process that discovery once received by the Government.

The discovery in this case is substantial. It is comprised of approximately 24,000 pages, although many of these "pages" signify excel sheets or data files. The data files include downloads of electronic devices that are much more time-consuming to review.

We are currently scheduled for a status conference on October 3, 2022. As this date was intended to be approximately one month after the completion of briefing on pretrial motions, we would also request that the Court reset that date for approximately one month.

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The parties agree that the delay due to this modification of the scheduling order is excludable under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, as the defense needs additional time to review the discovery and prepare pretrial motions. According, we would request that the Court find that the ends of justice served by excluding this time outweigh the Defendant's and the public's interest in a speedy trial, making any delay occasioned by this request excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,



Mary Stillinger